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June 17, 2021

The Hon. Judge Edgardo Ramos
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: 1:20-cv-10735-ER; Strike 3 Holding, LLC v. John Doe subscriber assigned IP Address 100.12.248.145 // Plaintiff's First Letter Motion for Leave to File Unredacted Versions of its First Amended Complaint, Proposed Summons, and Return of Service Under Seal

Dear Judge Ramos:

The James Law Firm, PLLC represents Plaintiff in the above-captioned matter. Plaintiff respectfully requests an order allowing Plaintiff leave to file unredacted versions of its First Amended Complaint, proposed summons, and return of service under seal.

Plaintiff is the owner of award-winning, critically acclaimed adult motion pictures. Strike 3's motion pictures are distributed through the *Blacked*, *Tushy*, *Vixen*, and *Blacked Raw* adult websites and DVDs. Plaintiff recorded a number of infringing transactions emanating from IP address 100.12.248.145 within the BitTorrent network. Accordingly, this Court recently permitted Plaintiff to serve a subpoena on the Internet Service Provider ("ISP"), Verizon Fios ("ISP"), to discover the identity of the subscriber assigned the IP address 100.12.248.145, the IP address used to download and distribute Plaintiff's works via the BitTorrent network. After receiving the subpoena response, Plaintiff conducted a further investigation. Based on the investigation of the subscriber and publicly available resources, Plaintiff identified another individual residing in the subscriber's home as the true infringer/Defendant. Plaintiff has now filed its First Amended Complaint against Defendant before this Court.

On May 24, 2021, this Court granted the parties' Joint Motion for Protective Order which requires that Defendant be referred to as John Doe in all filings. Therefore, Plaintiff filed its First Amended Complaint against Defendant maintaining their anonymity within the caption of the case. Although the caption does not contain Defendant's personal identifying information, the body of the First Amended Complaint contains such information. This information is central to Plaintiff's claim and includes the Defendant's name, address, and additional factual information which directly links the Defendant to the infringement in this case. This information has been redacted from Plaintiff's publicly filed First Amended Complaint.

Accordingly, in accordance with this Court's Order and out of respect for this Court and Defendant, Plaintiff respectfully requests entry of an order permitting it to file an unredacted version of its First Amended Complaint, proposed summons, and return of service under seal under seal so that it may include Defendant's name, address, and other factual information central to Plaintiff's claim.

Respectfully submitted,

By: Jacqueline M. James

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